

# **EXHIBIT 150**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Defendants.

**DECLARATION OF CHAOUKI ABDALLAH,  
INTERIM PRESIDENT OF THE UNIVERSITY OF NEW MEXICO**

Pursuant to 28 U.S.C. Sec. 1746, I hereby declare:

1. I am over the age of 18 and competent to testify.
2. I am the interim president of The University of New Mexico (UNM), New Mexico's largest research university.
3. As interim president, my office and the departments reporting to me are in frequent consultation with recipients of the benefits of Deferred Action for Childhood Arrivals (DACA), including students, staff and the families of students and staff, a large portion of whom are concerned that a change to their legal status will affect their academic studies or their professional futures.

4. UNM has a total enrollment of approximately 33,000 students at its central and four branch campuses, and employs more than 9,500 individuals.

5. UNM has the support of more than 170,000 active alumni within the United States and almost 2,000 outside the country, a percentage of whom are likely to be DACA-eligible or DACA recipients.

6. UNM sponsors international programs and a degree program in Latin American Studies, which may appeal to DACA students and may be impacted by a loss of DACA as a legal status.

7. UNM's Division of Equity and Inclusion was formed in 2008 to strengthen its organizational capacity to serve UNM's diverse student body. The state of New Mexico includes a 58% minority population, and as its flagship institution, UNM boasts 51% underserved minority students at its main campus. At its branch campuses in Gallup, Taos, Valencia County and Los Alamos, underserved minority students represent 75% of the student population.

8. In 2011, as the UNM Provost, I assembled a 22-member Diversity Council, bringing together broad cross-section of occupations, disciplines and backgrounds from across UNM's academic community to improve the university's performance in diversity, equity and inclusion. The work of the Diversity Council will culminate in 2021 with a re-envisioned actionable Diversity Plan to lead the university in weaving a strategic plan that values diversity into the very fabric of daily operations. The vision of the Diversity Council is to embody diversity, equity, inclusion and excellence as a strength and strategic advantage.

9. New Mexico has a historically diverse population, and today stands as one of four states in the U.S. that can claim minority-majority status by which the minority population of the state outnumbers the non-minority population.

10. A major mission of the University involves helping to provide students with "values, habits of mind, knowledge, and skills that they need to be enlightened citizens."

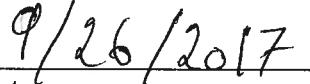
11. The UNM undergraduate population is comprised of approximately 49% Hispanic or Latino students; 25% Anglo students, 6% Native American students, 4% Asian American students, 3% African American students and 2% international students. In its graduate and professional programs, UNM's student population is 28% Hispanic or Latino, 45% Anglo, 4% Native American, 4% Asian American, 2% African American and 11% international. Among these, it is likely some are DACA recipients or the families of DACA recipients.

12. Last fall, UNM entered a memorandum of understanding with the Mexican consulate to help students succeed in higher education through the IME-Becas Scholarship Program funded in part by the Government of Mexico. The UNM College Enrichment and Outreach Program (CEOP) received \$50,000 from the scholarship and the UNM Center for English Language and American Culture (CELAC) received \$5,000. CEOP works to ensure students equal access to education, while CELAC provides international students with the English language skills they need to succeed.

13. UNM values the diversity of its students, faculty, and staff and believes that the educational process is clearly enriched and strengthened by the fact that ideas arise and are evaluated from such different perspectives.

14. I declare under penalty of perjury that the foregoing is true and correct.

  
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Chaouki Abdallah  
Interim President  
The University of New Mexico  
MSC05 3300  
1 University of New Mexico  
Albuquerque, NM 87131

  
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Date